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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF AARON CERA IN
SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL PORTIONS OF
PARTIES' JOINT LETTER BRIEF**

I, Aaron Cera, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am an associate of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Richard Kadrey, Sarah Silverman and Christopher Golden (“Plaintiffs”) in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Administrative Motion to File Under Seal Portions of Parties’ Joint Letter Brief (“Letter Brief”).
2. Plaintiffs have reviewed and complied with Civil Local Rule 79-5.
3. The Parties have filed under seal Exhibit C of the Letter Brief that contains material and information that Plaintiffs contend is attorney work product.
4. The following chart sets forth details regarding the information Plaintiffs seek to file under seal:

Redacted Portion	Description of Information	Reason for Sealing
Entirety of Exhibit C	Plaintiffs’ Attorneys’ Work Product	Work product documents subject to pending privilege dispute

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of September 2024 in San Francisco, California.

Dated:

By: /s/ Aaron Cera
Aaron Cera

ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: September 12, 2024

/s/ Kathleen Hartnett
Kathleen Hartnett